

Testimony

Regarding Proposals Seeking to Amend the Class 1 Fluid Milk Product Definition

Federal Register Volume 70, Number 69

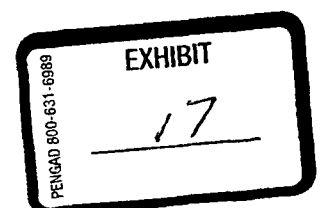
Proposed Rules Page 19012-19015

By: Tinamarie Carlin, Meshoppen, PA 18630

On behalf of Farm Wives United

Hearing Convening on June 20, 2005, Pittsburgh,
Pennsylvania

Held by: USDA/Agricultural Marketing Service/Dairy
Division



Testimony presented at USDA Agricultural Marketing Service Hearing
Concerning the definition of Class 1 Milk
Tinamarie Carlin
June 21, 2005

Your Honor, I am Tinamarie Carlin, a member of Farm Wives United, a group of farm wives from New York and Pennsylvania who are concerned with the injustices going on in agriculture here in the United States. My husband, Gerald, is a fourth generation dairy farmer. We farm in Susquehanna County, Pennsylvania. Our farm has been in Gerald's family for over one hundred years. Together we are raising our son age 15 and three daughters ages 15, 13, and 12. They are the reason why I am here today.

One of the major reasons for the low milk prices being paid to dairy farmers here in the United States is that many cheese processors illegally use an inexpensive and plentiful imported product called milk protein concentrate (MPC). By using MPC, these processors inflate their profits and deflate the milk prices paid to dairy farmers. In some cases, MPC is a by product left over from the manufacturing of dairy products or it is a mixture of casein and non-fat dry milk.

I am very concerned about the proposals which would allow MPC and casein to be used in fluid milk. Traditionally casein has only been used in imitation products and MPC has not been safely tested by the Food and Drug Administration (FDA) and does not have Generally Regarded as Safe (GRAS) status. Even though there has been considerable pressure on the dairy processing industry to do safety testing on MPC, none has been done to date. What is the processing industry trying to hide?

The biggest offender of the illegal use of MPC is Kraft Foods North America, Inc. Kraft has sidestepped FDA standards of identity by changing of their Kraft Singles with MPC as an ingredient from "pasteurized process cheese food" to "pasteurized prepared cheese product." (See attached #1) MPC has made what used to be a good cheese into a product that is almost like plastic. This cheese has a bad taste and does not melt like it used to. It is no wonder that Kraft is advertising that they add a little "magic" into its Kraft Singles. Our children watch these ads and believe that what they are eating is good for them, when in turn, these products have not had any kind of safety testing done to them. The more a food is processed, the fewer digestible nutrients are available. Again, I ask, what is the processing industry trying to hide?

Another item that I would like to mention is the "REAL" Seal. According to the Guidelines for the use of the "REAL" Seal, The product must be a Domestic Consumer Product. This means it must be manufactured or processed in a domestic facility and contains only domestically produced dairy ingredients. (Made in the USA.) The product cannot contain any Casein, Caseinate, Vegetable Oil, or Non Domestic Dairy Protein or Ingredient, or any Cheese Substitute or Cheese Analog in it. (See attached #'s 2 & 3 Dairy Management Inc. Guidelines for the use of the "REAL" Seal and Certified User Agreement

Appendix A) I have found a product in our local supermarket that has both the REAL Seal and milk protein concentrate listed as one of its ingredients. (See attached #4) How is it that the processors can get away with adding a non domestic ingredient and still be able to have the REAL Seal on it? Also, how can these products be allowed in Class 1 fluid milk?

I personally try to read labels and as a practice will not intentionally buy products with MPC listed on them. This is very hard to do because there are over four dozen products that my family enjoys eating that have MPC as an ingredient.

As the wife of a dairy farmer and mother of four, please do not change the current regulations on fluid milk. Keep milk wholesome in the United States. To do otherwise, would put our consumers at risk and devastate our dairy farmers by displacing superior products with inferior products.

Foot notes

1. Kraft Singles labels showing milk protein concentrate as an ingredient.
2. Dairy Management Inc., Re: Guidelines for the use of the "REAL" Seal.
3. Certified User Agreement Appendix A
4. Price Chopper label with the "REAL" Seal and milk protein concentrate as ingredient

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TMA
good source of

Singles**KRAFT**

SEE NUTRITION INFORMATION FOR SATURATED FAT AND SODIUM CONTENT

*Milk Makes 'Em Taste Great!***Nutrition Facts**

Amount/serving	% DV*	Amount/serving	% DV*
Total Fat 5g	8%	Total Carb 2g	1%
Serv Size 1 slice (21g)		Sat Fat 3g	15%
Servings 16		Fiber 0g	0%
Calories 70		Cholest 20mg	7%
Fat Cal 45		Sugars 1g	
		Sodium 280mg	12%
		Protein 4g	

*Percent Daily Values (DV) are based on a 2,000 calorie diet.
Vitamin A 4% • Vitamin C 0% • Calcium 10% • Iron 0%

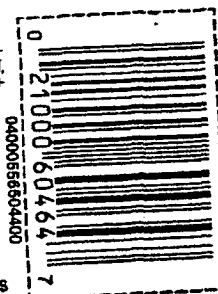
INGREDIENTS: MILK, WHEY, WATER, MILKFAT, MILK PROTEIN CONCENTRATE, SODIUM CITRATE, WHEY PROTEIN CONCENTRATE, SALT, SODIUM PHOSPHATE, SORBIC ACID AS A PRESERVATIVE, APOLAROTENAL (COLOR), ANNATTO (COLOR), ENZYMES, CHEESE CULTURE
KRAFT FOODS NORTH AMERICA, INC., GLENVIEW, IL 60025 USA

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CHEESE PRODUCT

KRAFT

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Suggested Retail Price

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the Calcium
plus
Vitamin D
Helps Build Strong Bones

Singles**KRAFT**

\$1.99
Suggested Retail Price

SEE NUTRITION INFORMATION FOR SATURATED FAT AND SODIUM CONTENT

*Milk Makes 'Em Taste Great!***Nutrition Facts**

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Total Fat 5g	8%	Total Carb 2g	1%
Serv Size 1 slice (21g)		Sat Fat 3g	15%
Servings 16		Fiber 0g	0%
Calories 70		Trans Fat 0g	
Fat Cal 45		Sugars 1g	
		Cholest 20mg	7%
		Protein 4g	
		Sodium 270mg	11%

*Percent Daily Values (DV) are based on a 2,000 calorie diet.
Vitamin A 4% • Vitamin C 0% • Calcium 25%
Iron 0% • Vitamin D 10%

Calcium Per Serving in This Product 25% vs
Process Cheese Food 10%

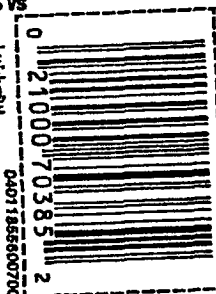
INGREDIENTS: MILK, WHEY, MILKFAT, MILK PROTEIN CONCENTRATE, SALT, CALCIUM PHOSPHATE, SODIUM CITRATE, WHEY PROTEIN CONCENTRATE, SODIUM PHOSPHATE, SORBIC ACID AS A PRESERVATIVE, APOLAROTENAL (COLOR), ANNATTO (COLOR), ENZYMES, VITAMIN D3, CHEESE CULTURE

KRAFT FOODS NORTH AMERICA
DIVISION OF KRAFT FOODS GLOBAL, INC.
GLENVIEW, IL 60025 USA

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RE: Guidelines for the use of the "REAL®" Seal

In order for a consumer product to be approved for the "REAL®" Seal the product must meet the following guidelines:

- It must be a Domestic Consumer Product. This means it must be manufactured or processed in a domestic facility and contains only domestically produced dairy ingredients. (Made in the USA.)
- If the product is a "Basic" (made from cows milk) Dairy Food it has to either meet the standards of identity outlined in the Code of Federal Regulations or be >51% Dairy.
- The product cannot contain any Casein, Caseinate, Vegetable Oil, or Non Domestic Dairy Protein or Ingredient, or any Cheese Substitute or Cheese Analog in it.
- The only packaged product we currently approve for the use of the REAL® Seal besides dairy products is Pizza. We would review the ingredients of the cheese that is being used.
- The REAL® Seal Program will only certify product(s) owned by the Applicant, this means the Applicant is the owner of the UPC number.

Please contact us if you have any questions regarding the Certification of the "REAL®" Seal at 888-273-REAL (7325) or fax information to 248-960-4500. Inquiries may be sent to:

REAL Seal Program
Attn: REAL® Seal Agent
565 Winwood Ct
Walled Lake, MI 48390

Thank you,

REAL® Seal Agent

CERTIFIED USER AGREEMENT APPENDIX A

The "REAL" Seal mark may only be used for products in one of the following categories:

1. Dairy Foods made from U.S. produced cow's milk which conform to standards for milk and dairy products established by Title 21, Parts 131, 133 and 135 of the Code of Federal Regulations as implemented by regulations adopted thereunder by the United States Department of Health and Human Services, Food and Drug Administration in effect as of the date of this agreement, and as same may be amended from time to time (the "Federal Standards")
2. Certified butter products, by Act of Congress, March 4, 1923, must be "made exclusively from milk or cream or both with or without common salt, and with or without additional coloring matter, and containing not less than 80 percent by weight milkfat, all tolerance having been allowed for" and made from U.S. produced cow's milk.
3. Dairy products made from U.S. produced cow's milk for which there is no Federal Standard Approval for use of the "REAL" Seal for such products may be granted by UDIA on a case by case basis. In the event that such a dairy product is offered for sale or distributed in a jurisdiction requiring a standard for its production, such product must comply with that jurisdiction's standards to use the "REAL" Seal mark.
4. Manufactured or combination food products which include a milk or dairy product component conforming to categories, 1, 2 or 3 above in which said dairy component comprises of at least 51 percent by weight of the content of the total product.
5. Pizza products as commonly recognized without restriction to normal variations in recipe and appearance which contain cheese(s) manufactured exclusively in the U.S. from U.S. produced cows milk and which conform(s) to the Federal Standards for cheese. Such pizza products may not contain any other cheese component nor a cheese substitute or analog product.

Note: The above requirements effectively preclude the use of the Real Seal on any products which contain imported dairy products or ingredients, including casein and caseinates, as well as products containing vegetable proteins

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AMERICAN
INGREDIENTS: CHEESE (MILK, CHEESE CULTURE, SALT, ENZYMES), WATER, MILKFAT, WHEY, MILK PROTEIN CONCENTRATE, CALCIUM PHOSPHATE, SODIUM CITRATE, SALT, SORBIC ACID AS A PRESERVATIVE

Percent Daily Values are based on a diet of other people's misdeeds.
Vitamin A 4%
Vitamin C 0%
Calcium 25%
Iron 0%

Nutrition Facts	
Amount Per Serving	
Serving Size 1 slice (21g)	Servings Per Container 16
Calories 70	Calories from Fat 45
%Daily Value*	
Total Fat 5g	8%
Saturated Fat 3.5g	16%
Cholesterol 10mg	3%
Sodium 260mg	11%
Total Carbohydrate 2g	0%
Dietary Fiber 0g	0%
Sugars 1g	
Protein 4g	



16 SINGLES



SINGLES



AMERICAN PASTEURIZED PREPARED CHEESE PRODUCT

16 SINGLES

16 SLICES (3/4 OZ. EA.) • NET WT. 12 OZ. (340g)



AMERICAN PASTEURIZED PREPARED CHEESE PRODUCT

16 SINGLES

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